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Counsel to AmCap Wilson II LLC and Wilson Norridge LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538-RDD
	:	
Debtors.	:	(Jointly Administered)
	:	

**ENTRY OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS,
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for AmCap Wilson II LLC and Wilson Norridge LLC (together, the (“AmCap Landlords”), and requests that all notices given or required to be given and all papers served or filed in connection with this Chapter 11 case be given to and served upon:

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PLEASE TAKE FURTHER NOTICE that the foregoing request encompasses all notices and pleadings referred to in Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy Procedure, including, without limitation, notices of any orders, motions, demands,

complaints, petitions, pleadings applications, and any other documents or requests brought before this Court in this Chapter 11 case, whether formal or informal, written or oral, or transmitted or conveyed by mail, messenger, telephone, telegraph, telecopier or otherwise.

PLEASE TAKE FURTHER NOTICE that the AmCap Landlords intend that neither this Entry of Appearance nor any later appearance, pleading, claim, or suit shall waive (1) the right of the AmCap Landlords to have final orders in non-core matters entered only after de novo review by a United States District Court Judge, (2) the right of the AmCap Landlords to arbitration and/or trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) the right of the AmCap Landlords to request the United States District Court to withdraw the reference or to abstain, in any manner subject to mandatory or discretionary withdrawal or abstention, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which the AmCap Landlords are or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments the AmCap Landlords expressly reserve.

New York, NY
June 26, 2020

ROBINSON & COLE LLP

/s/ Patrick M. Birney

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